UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS EASTERN DIVISION (BOSTON)

Jeffrey Solomon, Plaintiff,)))
,) Complaint
VS.) Civil Action No.
Annie Dookhan, Donald F. Keenan, Kate Corbett, JudyAnn Bigby, Jon Auerbach, Julie Nassif, Linda Han, Daniel Conley, and Suffolk County District Attorney's Office, Defendants.) C.A. No.: 1:13-cv-10208-GAO)))
)

MOTION FOR LEAVE TO FILE OPPOSITION LATE IN RESPONSE TO THE DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Now Comes the Plaintiff and respectfully asks that this Court grant him leave to file his opposition to the Defendant's Motion to Dismiss the Plaintiff's Amended Complaint past the time allowed by the Rules, on or before June 10, 2013. In support of this Motion, the Plaintiff would state that Counsel for the Defendants has assented to this Motion; the plaintiff would like additional time to confer with his attorneys; counsel requires additional time due to their motion and trial calendar in other areas of their practices, and counsel was ill when the Defendant's motion was filed.

WHEREFORE the Plaintiff moves this Honorable Court to ALLOW the Motion granting the Plaintiff leave to file his opposition to the Defendants' Motion for Judgment on the Pleadings pursuant to Fed. R. Civ. P. 12 (B)(6) late, on or before June 10, 2013.

The Plaintiff, Jeffrey Solomon, By his Attorneys,

/s/ Victoria Kelleher

Victoria Kelleher BBO# 637908 15 Church Street Salem, MA 01970 (978)744-4126- p (978)744-4127 - f vkelleher@verizon.net /s/Joseph M. Perullo

Joseph M. Perullo BBO# 670542 185 Devonshire Street, Suite 200 Boston, MA 02110 (617)423-0030-p (617)556-9965-f jp@josephperullo.com

Dated: May 13, 2013

LOCAL RULE CERTIFICATION

In accordance with Local Rule 7.1 (a)(2), the undersigned counsel for the Plaintiff, Jeffrey Solomon, certifies that he conferred, via electronic mail, with counsel for the Defendant, Donald Keenan, prior to the filing of the motion and Defense counsel stated that she assented to the Motion.

CERTIFICATION OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).